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August 12, 2013

BY HAND

The Honorable George B. Daniels United States District Judge Southern District of New York 500 Pearl Street. New York, NY 10007-1312

AUG 13 2013

Re: Heather Zhao v. Deutsche Bank AG

13 CV_2116 (GBD) (DF)

Dear Judge Daniels:

We represent defendant Deutsche Bank AG in the above-referenced matter. We write jointly on behalf of the parties to respectfully request that the Court extend the deadline of today, August 12, 2013, for the parties to submit a proposed e-discovery protocol to be so ordered by the Court. The parties respectfully request that this deadline be extended until August 30, 2013. This is the parties' first request for an extension with respect to this deadline. We request this extension in order to allow the parties additional time to attempt to negotiate with respect to the e-discovery protocol. This extension would not affect any other dates as set forth in the Case Management Plan and Scheduling Order.

Thank you for your consideration.

Respectfully submitted,

Eliza A. Kaiser

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